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ATTORNEY FOR THE DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

IN RE: §  
CHASATEE NICHOLE CARBAUGH § CASE NO. 24-33415  
§  
§  
DEBTOR § CHAPTER 13

DEBTOR'S OPPOSED RESPONSE TO OWINGS AUTO CENTER LLC'S MOTION FOR  
RELIEF FROM THE AUTOMATIC STAY

TO THE HONORABLE JUDGE OF THIS COURT:

COMES NOW Chasatee Nichole Carbaugh, Respondent in the above-styled and numbered cause, and in response to The Motion for Relief from Stay of Owings Auto Center, LLC ("Movant"), Respondent would respectfully show:

1. The allegations of Movant contained in paragraphs 1 and 4 of the motion are admitted.
2. The allegations of Movant contained in paragraphs 8 and 11 of the motion are denied. Respondent would show that she can provide Movant with adequate protection by curing any delinquency that may be owed to Movant by way of an agreement or plan modification and providing proof of insurance.
3. The allegations of Movant contained in paragraphs 2, 3, 5, 6, 7, 9, and 10 of the motion may not be admitted or denied as the Respondent is without sufficient knowledge or

information to form a belief as to the truth and therefore make a qualified denial.

WHEREFORE, PREMISES CONSIDERED, Respondent respectfully prays that Movant's Motion for Relief from Stay be denied and for such other and further relief as the Court may deem just and appropriate.

Respectfully submitted,

By: /s/ Nathan S. Graham  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on December 26, 2024, a true and correct copy of the foregoing Response to Motion for Relief from Stay was served on the following parties in interest by first class mail or electronic notice:

Chasatee Nichol Carbaugh  
15287 Hanging Tree  
Terrell, TX 75161

Thomas Powers  
105 Decker Court, Ste. 1150  
Irving, TX 75062

US Trustee  
United States Trustee  
1100 Commerce Street  
Room 976  
Dallas, TX 75202

Norred Law, PLLC  
Clayton L. Everett  
515 E. Border Street  
Arlington, TX 76010

Attn: Bridgecrest Credit Company, LLC as Agent and Servicer for Carvana, LLC Department  
AIS Portfolio Services, LLC  
Account: XXXXXXXXX2303  
4515 N Santa Fe Ave. Dept APS  
Oklahoma City, OK 73118

Linebarger Goggan Blair & Sampson, LLC  
Camille Stecker  
2777 N. Stemmons Freeway  
Suite 1000  
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Stephen Wilcox  
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By: /s/ Nathan S. Graham  
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